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March 22, 2021

Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

BY ECF

Re: *United States v. Chen Xiang*  
02 Cr. 271 (LAP)

Dear Judge Preska:

I represented defendant “Chen Xiang” (his actual name is Xiang Chen) at his trial, sentencing and appeal in this matter, pursuant to the Criminal Justice Act (CJA). I write to respectfully request that the Court reappoint me under the CJA to represent Mr. Chen for the purpose of filing a motion to reduce his sentence under 18 U.S.C. § 3582(c)(1)(A), as amended by the First Step Act of 2018.

I make this request because Mr. Chen appears eligible for a reduced sentence under *United States v. Brooker*, 976 F.3d 228 (2d Cir. 2020). He was sentenced in 2006 to a total term of 754 months of imprisonment, including three consecutive or “stacked” terms of imprisonment for violating 18 U.S.C. § 924(c). Courts have recognized that the health dangers posed to prisoners by the current COVID-19 pandemic, combined with the “brutal impact” of mandatory pre-First Step Act “stacked” § 924(c) sentences, can constitute “extraordinary and compelling reasons” warranting a sentence reduction. *E.g.*, *United States v. Haynes*, 456 F. Supp. 3d 496, 514–18 (E.D.N.Y. 2020). Accordingly, I respectfully request that the Court appoint me to seek a reduced sentence on Mr. Chen’s behalf.

Thank you for your consideration of this application.

Very truly yours,

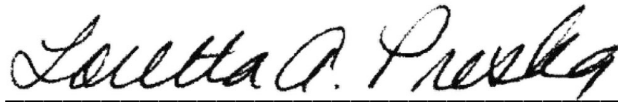
*Sanford Talkin*

Sanford Talkin

Sanford Talkin is hereby appointed, pursuant to the Criminal Justice Act, to represent Mr. Chen for the purpose of filing a motion to reduce his sentence under 18 U.S.C. § 3582(c)(1)(A).

**SO ORDERED.**

Dated: March 23, 2021  
New York, New York

A handwritten signature in black ink, reading "Loretta A. Preska". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

LORETTA A. PRESKA, U.S.D.J.